

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY  
CAMDEN VICINAGE**

**IN RE: VALSARTAN, LOSARTAN,  
AND IRBESARTAN PRODUCTS  
LIABILITY LITIGATION**

**This Document Relates to All Actions**

MDL No. 2875

Honorable Robert B. Kugler,  
District Court Judge

Oral Argument Requested

**NOTICE OF DEFENDANTS' JOINT  
MOTION TO EXCLUDE THE OPINIONS OF JOHN QUICK**

**PLEASE TAKE NOTICE** that on July 5, 2022, or as soon thereafter as counsel may be heard, the undersigned Defense Executive Committee counsel, on behalf of all Defendants named below, shall move for an entry of Order excluding the opinions of Plaintiffs' expert John Quick, pursuant to Federal Rules of Evidence 104, 702, and 703.

**PLEASE TAKE FURTHER NOTICE** that in support of their motion, the undersigned defendants shall rely upon the Memorandum of Law in Support submitted herewith, and any reply submissions made hereafter, and the Certification of Victoria Davis Lockard, Esq. together with exhibits; and

**PLEASE TAKE FURTHER NOTICE** that a proposed Order is submitted herewith; and

**PLEASE TAKE FURTHER NOTICE** that oral argument is requested.

Dated: May 3, 2022

Respectfully submitted:

By: /s/ Victoria Davis Lockard

GREENBERG TRAURIG, LLP  
Lori G. Cohen  
Victoria Davis Lockard  
Steven M. Harkins  
Terminus 200  
3333 Piedmont Road, N.E.,  
Suite 2500  
Atlanta, Georgia 30305  
Tel. (678) 553-2100  
Fax. (678) 553-2386  
CohenL@gtlaw.com  
LockardV@gtlaw.com  
HarkinsS@gtlaw.com

*Counsel for Teva Pharmaceuticals  
USA, Inc., Teva Pharmaceutical  
Industries Ltd., Actavis Pharma, Inc.,  
and Actavis LLC*

SKADDEN, ARPS, SLATE,  
MEAGHER & FLOM LLP  
Jessica D. Miller, *Liaison Counsel for  
Manufacturer Defendants*  
Nina R. Rose  
1440 New York Ave., N.W.  
Washington, D.C. 20005  
Tel.: (202) 371-7000  
Fax: (202) 661-0525  
jessica.miller@skadden.com  
nina.rose@skadden.com

*Counsel for Zhejiang Huahai  
Pharmaceutical Co, Ltd., Huahai U.S., Inc.,  
Prinston Pharmaceutical Inc. and  
Solco Healthcare US, LLC*

PIETRAGALLO GORDON ALFANO  
BOSICK & RASPANTI, LLP  
Clem C. Trischler  
Jason M. Reefer  
Frank H. Stoy  
38th Floor, One Oxford Centre  
Pittsburgh, Pennsylvania 15219  
Tel: (412) 263-2000  
Fax: (412) 263-2001  
[cct@pietragallo.com](mailto:cct@pietragallo.com)  
[jmr@pietragallo.com](mailto:jmr@pietragallo.com)  
[lhs@pietragallo.com](mailto:lhs@pietragallo.com)

*Counsel for Mylan Laboratories, Ltd.  
and Mylan Pharmaceuticals, Inc.*

KIRKLAND & ELLIS LLP  
Devora W. Allon  
Alexia R. Brancato  
601 Lexington Avenue  
New York, New York 10022  
Tel: (212) 446-5967  
Fax: (212) 446-6460  
[devora.allon@kirkland.com](mailto:devora.allon@kirkland.com)  
[alexia.brancato@kirkland.com](mailto:alexia.brancato@kirkland.com)

*Attorneys for Torrent Pharmaceuticals Ltd.  
and Torrent Pharma Inc.*

MORGAN, LEWIS & BOCKIUS LLP  
John P. Lavelle, Jr.  
1701 Market Street  
Philadelphia, Pennsylvania 19103  
Tel: (215) 963-5000  
Fax: (215) 963-5001  
[john.lavelle@morganlewis.com](mailto:john.lavelle@morganlewis.com)

John K. Gisleson  
One Oxford Centre, Thirty-Second Floor  
Pittsburgh, Pennsylvania 15219  
Tel: (412) 560-3300  
Fax: (412) 560-7001  
john.gisleson@morganlewis.com

*Attorneys for Aurobindo Pharma Ltd.,  
Aurobindo Pharma USA, Inc., and  
Aurolife Pharma LLC*

LEWIS BRISBOIS BISGAARD &  
SMITH LLP  
Walter H. Swayze, III  
Andrew F. Albero  
550 E. Swedesford Road, Suite 270  
Wayne, Pennsylvania 19087  
Tel: (215) 977-4100  
Fax: (215) 977-4101  
pete.swayze@lewisbrisbois.com  
andrew.albero@lewisbrisbois.com

*Attorneys for Camber Pharmaceuticals, Inc.  
and The Kroger Co.*

HILL WALLACK LLP  
Eric I. Abraham  
William P. Murtha  
21 Roszel Road  
P.O. Box 5226  
Princeton, New Jersey 08543-5226  
Tel: (609) 734-6358  
Fax: (609) 452-1888  
eabraham@hillwallack.com  
wmurtha@hillwallack.com

*Attorneys for Hetero Drugs, Ltd.  
and Hetero Labs Ltd.*

HARDIN KUNDLA MCKEON &  
POLETT  
Janet L. Poletto, Esq.  
Robert E. Blanton, Jr., Esq.  
673 Morris Ave.  
Springfield, New Jersey 07081  
Tel: (973) 912-5222  
Fax: (973) 912-9212  
[jpoletto@hkmpp.com](mailto:jpoletto@hkmpp.com)  
[rblanton@hkmpp.com](mailto:rblanton@hkmpp.com)

*Attorneys for Hetero USA Inc.*

BARNES & THORNBURG LLP  
Sarah E. Johnston, *Liaison Counsel for  
Retailer Defendants*  
Kristen L. Richer  
2029 Century Park East, Suite 300  
Los Angeles, CA 90067  
Tel: (310) 284-3798  
Fax: (310) 284-3894  
[sarah.johnston@btlaw.com](mailto:sarah.johnston@btlaw.com)  
[Kristen.Richer@btlaw.com](mailto:Kristen.Richer@btlaw.com)

Kara M. Kapke  
11 S Meridian St.  
Indianapolis, Indiana 46204  
Tel: (317) 236-1313  
Fax (317) 231-7433  
[kara.kapke@btlaw.com](mailto:kara.kapke@btlaw.com)

*Attorneys for CVS Pharmacy, Inc.  
(incorrectly named as CVS Health  
Corporation), Rite Aid Corporation,  
Walgreen Co. (incorrectly named as  
Walgreens Co.), and Walmart Inc.  
(incorrectly named as Walmart Stores, Inc.)*

HUSCH BLACKWELL LLP  
Matt Knepper  
James Spung  
190 Carondelet Plaza  
Suite 600  
St. Louis, Missouri 63105  
Tel: (314) 480-1500  
Fax: (314) 480-1505  
[matt.knepper@huschblackwell.com](mailto:matt.knepper@huschblackwell.com)  
[james.spung@huschblackwell.com](mailto:james.spung@huschblackwell.com)

*Attorneys for Express Scripts, Inc.*

DORSEY & WHITNEY LLP  
Roxanna Gonzalez  
51 West 52nd Street  
New York, New York 10019  
Tel: (212) 415-9357  
Fax: (212) 953-7201  
[gonzalez.roxanna@dorsey.com](mailto:gonzalez.roxanna@dorsey.com)

*Attorneys for Optum, Inc. and  
Optum Rx*

BUCHANAN INGERSOLL &  
ROONEY PC  
Jonathan D. Janow  
Jason R. Parish  
1700 K Street NW  
Suite 300  
Washington, DC 20006  
Tel: (202) 452-7940  
Fax: (202) 452-7989  
[jonathan.janow@bipc.com](mailto:jonathan.janow@bipc.com)  
[jason.parish@bipc.com](mailto:jason.parish@bipc.com)

*Attorneys for Albertson's LLC*

ULMER & BERNE LLP  
Jeffrey D. Geoppinger  
*Liaison Counsel for Wholesalers*  
312 Walnut Street, Suite 1400  
Cincinnati, OH 45202-2409  
Tel: (513) 698-5038  
Fax: (513) 698-5039  
Email: [jgeoppinger@ulmer.com](mailto:jgeoppinger@ulmer.com)

*Counsel for AmerisourceBergen Corporation*

CROWELL & MORING  
Andrew D. Kaplan  
Daniel T. Campbell  
Marie S. Dennis  
1001 Pennsylvania Avenue, NW  
Washington, DC 20004  
Tel: (202) 624-1000  
Fax: (202) 628-5116  
Email: [akaplan@crowell.com](mailto:akaplan@crowell.com)  
Email: [dcampbell@crowell.com](mailto:dcampbell@crowell.com)  
Email: [mdennis@crowell.com](mailto:mdennis@crowell.com)

*Counsel for Cardinal Health, Inc.*

NORTON ROSE FULBRIGHT US LLP  
D'Lesli M. Davis  
Ellie K. Norris  
2200 Ross Avenue, Suite 3600  
Dallas, TX 75201-7932  
Tel: (214) 855-8221  
Fax: (214) 855-8200  
[dlesli.davis@nortonrosefulbright.com](mailto:dlesli.davis@nortonrosefulbright.com)  
[ellie.norris@nortonrosefulbrighth.com](mailto:ellie.norris@nortonrosefulbrighth.com)

*Counsel for McKesson Corporation*

**CERTIFICATE OF SERVICE**

I, Kate Wittlake, an attorney, hereby certify that on May 3, 2022, I caused a copy of the foregoing document to be served on all counsel of record via CM/ECF.

/s/ *Kate Wittlake*  
Kate Wittlake  
Greenberg Traurig, LLP